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Sauget Area 2 Sites Group

May 10th, 2002

Mr. Mike Ribordy
U.S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

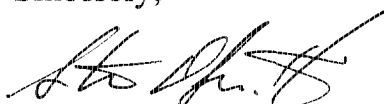
RE: Sauget Area 2

Deliver by Overnight Mail

Dear Mike:

Attached is the Sauget Area 2 Sites Group monthly report for Sauget Area 2, as required under section 2.4 of our Administrative Order by Consent. If you have any questions, please call.

Sincerely,



Steven D. Smith
Project Coordinator

cc: Sandra Bron - Illinois EPA
Kevin de la Bruere - U.S. Fish & Wildlife
Mike Henry - Illinois Department of Natural Resources
Peter Barrett - CH2M Hill
SA2SG File

SAUGET SITES - AREA 2
MONTHLY PROGRESS REPORT
For April 2002

Key Actions on the Support Sampling Plan

Previous Actions

The SA2SG submitted the proposed six volumes Support Sampling Plan (SSP) to the agencies on February 21st, 2001.

April 5th, 2001 the SA2SG received comments on the Support Sampling Plan (SSP) from EPA, EPA's consultant CH2M Hill, Illinois EPA, and U.S. Fish & Wildlife.

The SA2SG received corrected comments from the U.S. Fish & Wildlife on April 10th, 2001.

On April 19th and April 20th the SA2SG met with EPA, EPA's consultant CH2M Hill, Illinois EPA, and U.S. Fish & Wildlife to discuss the SSP comments. Significant progress was made toward resolving outstanding issues. The EPA set the date for the SSP re-submittal for May 25th, 2001.

The SA2SG prepared and submitted a revised set of SSP documents on May 25th, 2001.

On June 20th, 2001 comments on Revision 1 of the SSP were received from EPA, Illinois EPA, U.S. Fish & Wildlife, and CH2M Hill. The EPA advised that additional comments on the QAPP might be forthcoming.

On July 17, 2001 comments on Revision 1 of the SSP were received from Mr. Jim Chapman, EPA.

On July 27th, additional comments on Revision 1 of the SSP were received from CH2M Hill, as well as comments from EPA Chemist Richard Byvik

A meeting was held between EPA, CH2M Hill, and the SA2SG on August 2nd, 2001 to discuss the above comments. Several issues were resolved and USEPA agreed to follow-up on some outstanding issues.

On September 9, 2001, the SA2SG submitted the Addendums and revisions to the work plans reflecting the scope changes agreed to since the previous SSP submittal as well as comments from the three laboratories responding to Mr. Richard Byvik's comments.

On October 5, the SA2SG received preliminary comments on the first revision to the QAPP from USEPA.

Comments on the Ecological Risk Assessment Work Plan were received from USEPA on October 5th.

A conference call was held on October 9th between the USEPA, and contractors for the SA2SG to discuss various SOP and laboratory issues. Progress was made on several issues.

On October 28th, the SA2SG submitted a revised Ecological Risk Assessment in response to the previous USEPA comments.

USEPA approved parts of the SSP on October 29th, 2001. These portions of the SSP pertained to the field sampling work planned for Site Q.

On October 30th, the SA2SG received additional comments from IEPA on the SSP, and additional comments from USEPA on the Ecological Risk Assessment Work Plan.

On November 5th, the SA2SG began field activities at Site Q to conduct soil gas samples, soil VOC and SVOC samples, soil XRF samples, and the magnetometer survey (collectively the Site Q Screening Survey). Throughout the course of the Site Q Screening Survey, USEPA oversight was provided by CH2M Hill personnel Peter Barrett, Ning Li, and Julie Mottin

On November 6th, the SA2SG received additional comments from USEPA on the Hydrologic SOP's.

On November 7th, the SA2SG submitted responses to the USEPA comments on the Hydrologic SOP's.

USEPA approved the SA2SG responses to comments on the Hydrologic SOP's on November 8th.

On November 19th, the SA2SG received additional comments from the USEPA and IEPA regarding the revised RI/FS Support Sampling Plan submitted September 10, 2001.

On November 20th, the Site Q screening assessment was completed for the properties for which the landowners have granted the SA2SG access.

On November 29th, the SA2SG held a technical committee meeting to discuss the USEPA and IEPA comments to the September 10, 2001, revised RI/FS Support Sampling Plan.

During December, the SA2SG consultant began data evaluation of the Site Q Screening Survey results.

On December 18th, the SA2SG responded to the various comments received from USEPA on November 19th, 2001. Also a revised Ecological Risk Assessment Work Plan was submitted for agency review.

On December 21, 2001, a Draft Focused Feasibility Study was submitted to the EPA, looking at the feasibility of an Interim Groundwater Remedy.

The results of the Site Q sampling were submitted to the EPA on February 1, 2002. This package of information included the original data plus 16 Dot Maps summarizing the results of the analysis. Drawings showing the proposed trenching locations for each of the five sites were also included.

A meeting was held on March 7th, 2002 with all parties to discuss the remaining SSP issues. Conceptual agreement was reached on the location and number of sampling points, subject to further review by Illinois EPA. The SA2SG was asked to put together a revised map showing all sampling locations, and to begin revising and updating the SSP documents.

The SA2SG revised the sampling locations map to reflect changes made during the March 7th meeting. This map was submitted on March 20th, 2002.

A revised Focused Feasibility Study was submitted to the EPA on March 31st, 2002. This document (prepared by Solutia) is considering the feasibility of an interim groundwater remedy.

April 2002

A conference call was held on April 24th between the SA2SG Technical Committee, the EPA, Illinois EPA, and respective consultants to discuss the concept of using the Aquatic Ecological Risk Assessment (completed by Solutia) for the SA2SG RI/FS. The SA2SG will prepare a specific sampling proposal to the agencies for their review.

Data Submittal

No data was submitted this month.

Actions or Plans Scheduled for Next Month

The SA2SG is preparing a sampling proposal specifying the proposed sampling locations and analysis for sediment sampling in the Mississippi River.

Work will continue to resolve property access issues.

Sauget Area 2 Sites Group

May 9th, 2002

Mr. Mike Ribordy
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77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

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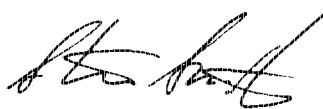
Dear Mike:

As we discussed by phone, I am asking for your concurrence that the IDW waste pad and the roll-off area to the south of the pad for the Sauget Sites Area 2 Sampling Work will be considered part of the CERCLA project, regulated by CERCLA and not RCRA.

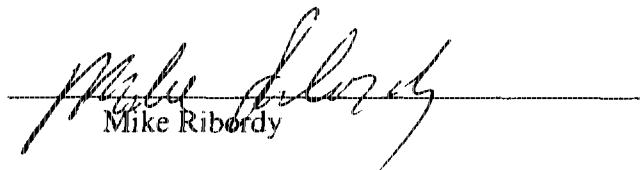
While we will attempt to remove all waste as promptly as possible, I do expect it to take at least 6 to 8 months to get the waste sampled, analyzed, bids received, contracts negotiated, and the waste removed.

We request your written confirmation of the above for our files, so that it is clear that this area is not regulated under the WGK Plant's RCRA program. If you are in agreement, please sign and return this letter. Any questions please call.

Sincerely,



Steven D. Smith
Project Coordinator


Mike Ribordy

5/15/02
Date